

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO. 4:14-CR-074-Y (01)

JONATHAN DANIEL KUTEJ

§

§

§

**MOTION TO WITHDRAW COUNSEL OF RECORD**

TO THE HONORABLE TERRY R. MEANS, UNITED STATES DISTRICT JUDGE:

This Motion to Withdraw as Counsel of Record is brought by J. Warren St. John, Movant, who is the Attorney of Record for JONATHAN DANIEL KUTEJ, the Defendant in the above-styled and numbered cause and who requests to withdraw as counsel of record.

In support, Movant would respectfully show the Court as follows:

1. Movant would show that he was appointed by the Court to represent Defendant on June 11, 2014. Defendant asked the Court to proceed Pro-Se, which was granted on November 13, 2014, after a hearing. On February 24, 2015, the Defendant asked the Court to appoint him an attorney. The undersigned attorney was, once again, appointed to represent the Defendant on March 10, 2015.

2. Movant would further show that today, along with several times in the past, he has attempted to speak with Defendant about his case at FCI, Fort Worth. Movant tried, at every visit, to discuss the facts of the case with Defendant. The Defendant was belligerent on today's date and would not discuss the facts of the case as it applies to the guidelines.

3. Defendant will not listen to the advice of his counsel, nor will he discuss any aspects of the case with his counsel. Defendant argues as to what the law is, versus what he thinks it is, or what he thinks it should be; therefore, Movant can no longer assist

Defendant in this matter.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests the Court grant this Motion and that Movant be allowed to withdraw as counsel of record in this cause.

Respectfully submitted,

s/J. Warren St. John  
J. WARREN ST. JOHN  
State Bar No. 18986300  
2020 Burnett Plaza  
801 Cherry Street, Unit No. 5  
Fort Worth, Texas 76102-6810  
Telephone: 817/336-1436  
Fax: 817/336-1429

ATTORNEY FOR DEFENDANT (1)

**CERTIFICATE OF CONFERENCE**

I hereby certify that on April 16, 2015, I spoke with Ms. Aisha Saleem in order to determine whether she would or would not oppose the foregoing Motion to Withdraw. Ms. Saleem is unopposed.

s/J. Warren St. John  
J. WARREN ST. JOHN

Attorney for Defendant (1)

**CERTIFICATE OF SERVICE**

I hereby certify that on April 16, 2015, I electronically filed the foregoing document with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Ms. Aisha Saleem.

s/J. Warren St. John  
J. WARREN ST. JOHN

Attorney for Defendant (1)